

Ryan Repp

From: Rob McAllister <rob.mcallister@brownells.com>
Sent: Thursday, August 30, 2018 1:37 PM
To: Ryan Repp
Cc: Teresa Mackewich
Subject: FW: Russia

FYI below.

Rob McAllister
VP of Strategic Development
Brownells, Inc.


From: Rob McAllister
Sent: Wednesday, November 25, 2015 8:21 AM
To: Pete Brownell <pete.brownell@brownells.com>
Subject: RE: Russia

Hi Pete,

I followed through with OFAC regarding the people on the itinerary. The last two guys on the list hit the OFAC "Specially Designated Nationals" (SDN) list of people to avoid. I specifically asked OFAC the question of meeting individuals like these if no business is transacted. Their response was that "the general rule of thumb, not necessarily a hard-and-fast rule" is to avoid a meeting if the SDN could "derive a benefit" from the interaction... especially if the meeting could be described as you providing a service to the SDN individual. The advice was to be cautious and be aware that you should provide no benefit to those SDN persons. If we want we can set up a further call with them to talk details, but I think we're on solid ground if the purpose of those SDN persons attending meetings is simply good will – i.e. the exchange of ideas is not between you and these individuals but rather between the NRA and The Right to Bear Arms group.

Rob

From: Pete Brownell
Sent: Tuesday, November 24, 2015 1:20 PM
To: Rob McAllister
Subject: FW: Russia

From: Perrine, Nicholas [<mailto:NPerrine@nrahq.org>]
Sent: Tuesday, November 24, 2015 1:01 PM
To: Roxie LaRue-Peters <Roxie.LaRuePeters@brownells.com>
Cc: Pete Brownell <Pete.Brownell@brownells.com>
Subject: Russia

Roxie,

Attached is the latest itinerary for Russia. Please send a scan of Mr. Brownell's passport photo page so we can get started on the visa.

Thanks,

Nick

Pete Brownell
Chief Executive Officer



Email: pete.brownell@brownells.com

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Order Line: 1-800-741-0015



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